## UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

BARBARA FORLASTRO AND ROBERT G. FORLASTRO, AS CO-ADMINISTRATORS OF

THE ESTATE OF ROBERT J. FORLASTRO : CIVIL NO.: 3:06 CV 01541(RNC)

VS. :

JAMES COLLINS : JANUARY 24, 2007

## MOTION FOR EXTENSION OF TIME

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 7(b) of the Local Rules of Civil Procedure, the defendant, James Collins, respectfully moves for an extension of time to respond, by either answer or objection, to plaintiffs' Complaint. The defendant requests an extension of time to and including February 19, 2007, to respond, by either answer or motion to the plaintiffs' Complaint.

Said extension is necessary as undersigned counsel was only recently retained to represent the interests of the defendant in this matter, and therefore, additional time is needed in order to investigate the allegations in the plaintiffs' Complaint and appropriately respond thereto.

This is the defendant's first motion seeking an extension of time of this deadline. Plaintiffs' counsel, Michael A. Stratton, has been consulted regarding this request and has indicated that he has no objection.

WHEREFORE, the defendant respectfully requests that his Motion for Extension of Time be granted.

Respectfully submitted,

THE DEFENDANT James Collins

BY: \_

STEVEN J. ERRANTE, ESQ. (ct04292) MARISA A. BELLAIR, ESQ. (ct23802) Fed. Bar No. ct04292

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## CERTIFICATION

I hereby certify that a copy of the above was sent electronically on January 24, 2007 to all counsel and *pro se* parties of record as follows:

Michael A. Stratton, Esq. Stratton Faxon 59 Elm Street New Haven, CT 06510

Steven J. Errante, Esq.